



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SPN:KTF

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 10, 2019

By ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Juan Ángel Napout, et al.
Criminal Docket No. 15-252 (S-2) (PKC) (RML)

Dear Judge Chen:

The government respectfully writes to request that the Court unseal the defendants' proposed jury instructions, filed in the above-captioned case at ECF Dkt. No. 809, to allow the parties to discuss the document in their appellate briefs and in oral argument before the Court of Appeals. This document was discussed in open court during the charging conference, see, e.g., Dec. 12, 2017 Trial Tr. at 4155, and it is unclear why it was filed under seal since it does not offer a basis for sealing and contains only proposed jury instructions. Counsel for defendants Napout and Marin have not yet responded to the government's request from earlier this afternoon for their position on this application.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
Samuel P. Nitze
M. Kristin Mace
Keith D. Edelman
Kaitlin T. Farrell
Assistant U.S. Attorneys
(718) 254-7000

cc: Counsel of record (by ECF)
Clerk of Court (PKC) (by ECF)